

IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

STAVANGER HOLDINGS, LTD and KARL  
ANDERSEN,

Plaintiffs,

vs.

TRANEN CAPITAL, LTD, TRANEN CAPITAL  
ALTERNATIVE INVESTMENT FUND, LTD.,  
THE LEO GROUP, LLC, KENNETH A.  
LANDGAARD, and ARTHUR L. BOWEN,

Defendants.

Civil Action No.: 12 - 00646 (WTL)(DKL)

**DECLARATION OF MAURO M. WOLFE, ESQ.**

Pursuant to 28 U.S.C, § 1746, Mauro M. Wolfe declares that the following facts are true and correct, subject to the laws against perjury of the United States of America::

1. I am a Partner at the law firm Duane Morris LLP, counsel to Plaintiffs Stavanger Holdings, Ltd. and Karl Andersen and am fully familiar with the facts set forth below. I submit this declaration in further support of Plaintiffs' Reply Memorandum of Law in Further Support of Plaintiffs' Motion to Compel Discovery from the Tranen Defendants.

2. A true and correct copy of Kenneth Landgaard's Affidavit, dated August 22, 2013, in the matter *Tranen Capital Alternative Investment Fund Limited v. Karl Andersen*, pending in The Eastern Caribbean Supreme Court, British Virgin Islands (Matter No. 103 of 2013), is attached hereto as Exhibit 15.

3. A true and correct copy of Arthur Bowen's letter to the Grand Cayman, Head of Insurance Supervision, Monetary Authority, dated January 17, 2012, is attached hereto as Exhibit 16.

4. A true and correct copy of the O'Neal Webster's engagement letter, dated November 12, 2007, is attached hereto as Exhibit 17. Based on my own review of the records, I have personal knowledge that the British Virgin Islands entities referenced in this engagement letter are the entities that became known as Tranen Capital Alternative Investment Fund and Tranen Capital LTD.

5. A true and correct copy of the Civil Complaint filed by Arent Fox LLP, is attached hereto as Exhibit 18.

6. A true and correct copy of a Statement from Information Process Management, Inc., a company owned and controlled by Landgaard, showing the payment of \$29,363.15 to Andersen, is attached hereto as Exhibit 19.

7. I have reviewed financial records which demonstrate that Plaintiffs have received remuneration from Tranen in the amount of approximately \$350,000.

8. I conducted a search on Google regarding the average commission rate brokers charge in the context of life settlements and found that the average rate is about 30%. A true and correct copy of a sample of my search results, is attached hereto as Exhibit 20.

9. A true and correct copy of a partially executed confidentiality stipulation, promising to maintain all records under the strictest of confidence, is attached hereto as Exhibit 21.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
September 5, 2013

/s/ Mauro M. Wolfe  
MAURO M. WOLFE

**CERTIFICATION**

I hereby certify that on this 5<sup>th</sup> day of September 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all of the parties who have subscribed to the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Mauro M. Wolfe  
Mauro M. Wolfe, Esq.